

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,)	CIVIL NO. 04-00502 DAE BMK
a Hawaii, nonprofit corporation;)	
NA'IMI PONO, a Hawaii)	
unincorporated association; and)	DECLARATION OF COLONEL
KIPUKA, a Hawaii unincorporated)	
association,)	STEFAN J. BANACH
)	
Plaintiffs,)	
)	
v.)	
)	
DONALD H. RUMSFELD, Secretary of)	Hearing:
United States Department of)	
Defense; and FRANCIS J. HARVEY,)	Date: December 18, 2006
Secretary of the United States)	Time: 9:45 a.m.
Department of the Army,)	Judge: Jon. David A. Ezra
)	
Defendants.)	
)	

DECLARATION OF COLONEL STEFAN J. BANACH

I, Colonel Stefan Banach, hereby declare that:

1. I am the commander of the 2nd Brigade Combat Team, 25th Infantry Division and U.S. Army Hawaii ("2/25th SBCT"). My complete background and experience is set forth in the declaration that I executed on November 8, 2006 and which was previously filed with this Court.

Ranges and Training at Schofield Barracks

2. The 2/25th SBCT needs to begin training no later than 5 January 2007 with the full compliment of its equipment, to include Stryker Vehicles, using the existing ranges at Schofield Barracks and the Pohakuloa Training Area (PTA) and the six additional facilities that the Army has requested to meet its current deployment timeline. Failure to do so will cause irreparable

harm to the Soldiers of the Stryker Brigade as we attempt to achieve an Initial Operating Capability (IOC) by 31 October 2007 and prepare for a subsequent deployment to combat in Iraq which could follow immediately after attaining IOC.

3. Time is our currency, and with each passing day we are burning valuable range construction time and valuable training time that we will never be able to make up.

4. The 2/25th SBCT has nearly 4,000 personnel that form thirty companies that consist of eighty-nine different types of platoons, all of which need to be fully trained to be able to shoot, move, and communicate on the modern battlefield of Iraq. The large training population coupled with the lack of ranges due to construction delays presents a significant training throughput issue for the Stryker Brigade, even assuming the court injunction is lifted in the near future. All of these factors clearly demonstrate immediate harm to our Soldiers as they attempt to prepare for combat operations in Iraq.

5. Further, the Stryker Brigade Soldiers need to train with the full compliment of their equipment to get themselves familiar with the sights, sounds, smells, confusion, and stress of warfare today. Simulation training or classroom training as permitted by the court injunction does not get Soldiers ready for war, and every day that we are limited to only these forms of training we increase the risk to our Soldiers in combat. For example, our Soldiers need to be able to drive their Stryker Vehicles everyday to enable successful maneuver in combat and to be able to negotiate the narrow and densely populated urban areas in Iraq. Our Soldiers also need full access to the different types of ammunition that they will fire in combat to include tracer, mortar, and Mobile Gun System (MGS) ammunition. Again, our Soldiers need to experience and see the full effects that all the different types of ammunition will have on the enemy and on the Soldiers

themselves when these rounds are fired. Our Soldiers need repetitive experiences with all the various types of live ammunition in training so they do not suffer casualties as a result of the effects of the munitions when they fire the weapons for the first time in combat. Failure to train with the full range of munitions represents irreparable harm to our Soldiers and is likely to lead to the harm of civilians and infrastructure that we will find on the battlefield in Iraq.

6. Central to successful training is the availability of the limited state-of-the-art training ranges being sought at this time, such as the QTR1 and the Urban Assault Course (UAC) at Schofield Barracks and Range 11T at PTA. These new ranges give immediate feedback to trainers for target hits during gunnery and also provide immediate camera feedback for live fire operations that are conducted on the Urban Assault Course. The 2/25th SBCT was already limited in the number of days that it could do live fire operations before the October 2006 court injunction. Delaying the construction of the UAC and Range 11T and denying the Stryker Brigade access to QTR1 will prevent our Soldiers from having the opportunity they need to conduct realistic training.

7. The focus of our training program moving forward will be to conduct live fire operations to standard during the day and at night. The enemy is not firing blanks at our Soldiers and we are not using simulators, such as MILES lasers, against the enemy in Iraq. There is no substitute for repetitive live fire operations; it is the only way our Soldiers will be adequately trained for war. The delay in the construction of the critical ranges, and suggested weapons and ammunition firing limitations at Schofield Barracks and PTA has and continues to place our live fire capabilities at very high risk.

Moving To the Mainland to Train Is Not Tenable

8. Our Soldiers are being killed nearly every week in Iraq. Our Soldiers are in harm's way every day in Iraq. They are making the ultimate sacrifice, and the Soldiers in the 2/25th SBCT are preparing to give their lives for our country if necessary. In this pressure filled and chaotic environment, it is necessary to provide training to the men and women of the 2/25th SBCT without simultaneously subjecting them to extended absences from their families immediately before their deployment to war.

9. Moving to another location to train will cause a loss of valuable training time and will affect our combat readiness. Time is our currency and we are burning it everyday we are not training with our Stryker Vehicles, and with each day that passes we are increasing the risk to our Soldiers in combat. Less training time will equate to more casualties in combat.

10. Specifically, moving the 2/25th SBCT to Fort Lewis to complete its training before deployment is a bankrupt idea and it is not tenable for this Stryker Brigade. Fort Lewis historically has only had two Stryker Brigades assigned to the installation at any given time. One of the Stryker Brigades remained at home station and trained for war while the second Stryker Brigade was deployed to combat. The Army has already made the decision to add a third Stryker Brigade to Fort Lewis. The Stryker Brigades are the largest ground combat brigades in our Army with nearly 4,000 personnel and over 1,850 wheeled vehicles and other pieces of rolling stock. Fort Lewis also has thirteen brigade equivalent organizations and will add a new Fires Brigade shortly as a result of a BRAC decision. Fort Lewis does not have room for a fourth Stryker Brigade Combat Team, and most importantly, the National Environmental Policy Act (NEPA) work has not been done at Fort Lewis to permit the 2/25th SBCT's restationing for training. The

NEPA work will take a significant amount of time, it will be costly, and these actions will eclipse the 2/25th SBCT's transformational and training timelines to be ready to meet an Initial Operating Capability (IOC) on 31 October 2007, which is when this brigade must be ready to deploy to combat.

Stress on Army Families

11. We are an Army at war. Our families live under the constant strain of knowing that their loved ones will deploy at some point to combat. The stress is enormous and must be addressed and managed to ensure combat readiness of the force. Moving to Fort Lewis for training would increase the deployment time for the 2/25th SBCT in the aggregate. Current deployments are planned for twelve months; but as we have seen with the 172d SBCT, they can be extended longer (nearly sixteen months in this case). Going to Fort Lewis would add several more months to the deployment timeline for the 2/25th SBCT. The increased deployment timelines precipitate a number of negative social externalities that have been manifested in our formation to date, and they include: domestic violence increases, drug use increases, suicide increases, an increase in suicide attempts, increased divorces, increases in alcoholism, and elevated cases of child abuse. During nineteen months of command we have had one Soldier commit suicide; countless other Soldiers and several spouses have attempted suicide or have made suicidal gestures. Domestic violence is an issue we deal with every week. In July 2005 one of our Soldiers murdered his daughter and is standing trial for that horrible act. We have had two Soldiers die from drug overdoses in the past seven months. DUI violations and alcohol abuse within the ranks are at an all time high; I have not seen anything like this before in my twenty-three and a half years of service in our Army. Stress and tension are at an all time high

within our ranks and within our Army families. Our families cannot shoulder any more burdens nor should they; they are doing their part in the war on terror.

12. The nearly weekly memorial ceremonies for the Soldiers killed in action during the 25th Infantry Division's current deployment in Iraq is a constant reminder to our Soldiers and their families of the harsh realities of war, as is the fact that we have seventy-seven of our own Soldiers currently deployed to combat and recently had one of our Stryker Sergeants killed in action in Iraq. Another one of our Stryker Sergeants was wounded two weeks ago as a result of being hit by an Improvised Explosive Device (IED) in Iraq. It was the third IED blast he has experienced since being deployed. Additionally, this SBCT has cross-leveled 325 of our personnel to deploying formations. We have recently deployed twenty Soldiers to Iraq in support of 3/25th IBC. We have also deployed another thirteen Soldiers in support of a short-notice Weapons Inspection Team tasking. This is the equivalent of a battalion's worth of combat power that has deployed from the 2/25th SBCT in the last twelve months. This Stryker Brigade deploys Soldiers continuously to combat. We need the ranges and training facilities to get them ready to go.

13. The possibility of having to train the 2/25th SBCT on the mainland is an incomprehensible course of action to contemplate, given the brigade's current transformational timeline. Having this SBCT train on the mainland would create a degree of uncertainty and chaos that no one would want in a time of peace, let alone a time of war. Being forced to train on the mainland would place enormous stress on our Army families, and the lack of predictability for the Soldiers and their families given the short notice that our unit would get to execute a course of action such as this would be demoralizing and catastrophic for the brigade. The 2/25th

SBCT would be completely disjointed given that we would have units on the mainland, Oahu and PTA all trying to train for war with a complete lack of unity of command and unity of effort, which are so important in our profession. As a result, this brigade would have units that are less trained and less prepared to deploy. All of this will result in higher casualty rates for the 2/25th SBCT in combat. Additionally, the intangible aspects of preparing a brigade for combat would be severely eroded throughout the unit in terms of team building, cohesion, and sharing lessons learned. The idea of training on the mainland is a recipe for disaster and would ensure that the 2/25th SBCT would not meet its current transformational and deployment requirements.

14. Additionally, the unprogrammed financial requirements would easily range in the tens of millions of dollars to train the entire SBCT and would involve enormous logistical challenges of moving and training a 4,000-person brigade on the mainland. Moreover, our transformational timeline juxtaposed against the units that are using mainland training areas and resources make this move impossible. We are an Army at war, and all of our Army Garrisons are getting units ready for war everyday. We do not have installations that are sitting idle in our Army today. Further, none of the logistical coordination to move this Stryker Brigade to the mainland for training has been done and it would not be done soon enough to keep the unit on its timeline to deploy to combat in early 2008. The financial considerations associated with moving a Stryker Brigade from Hawaii are enormous, but they are trumped by the cost to our Army families, our Soldiers, and to the all-volunteer force that we have built since the Vietnam War.

15. Finally, the leadership of this brigade would be challenged to the breaking point if this course of action was levied upon the unit. Our leaders work hard everyday, and many of them are still tired from the last thirteen-month deployment to Iraq. Conducting training in a

split-based manner would place an additional and unacceptable burden on all of the leaders in this Stryker Brigade Combat Team. Leaders make key decisions in training and in combat. In order to make good decisions that will keep our Soldiers alive, our leaders need to be rested. We do not need leaders who are tired and worn out before we deploy them to combat as a result of unnecessary training deployments that are forced upon the 2/25th SBCT. Pursuing training on the mainland would render this unit combat ineffective before it deployed.

All-Volunteer Army

16. Soldiers vote with their feet – this is a volunteer Army. If we do not allow Soldiers to train for war correctly, they will leave, and this puts the all-volunteer force at risk. We cannot over-burden our families or Soldiers with more deployment time. This is an Army of families. Army spouses cast the deciding vote when it is time for a Soldier to get out of the military. 62% of our Soldiers are married in Hawaii and 58% of our Soldiers are married across the Army. If we place too much stress on our families, we will lose the quality force we have built. This Stryker Brigade has had the highest reenlistment rates in the 25th Infantry Division over the past two years because Soldiers signed legally binding contracts to be Stryker Soldiers. If we move them to another installation, the chain of command will be breaking the contract with each of these Soldiers and this will damage our ability to retain and recruit the all-volunteer force.

17. The suggestion that we could quickly move the nearly 4,000 Soldiers, over 1,850 wheeled vehicles and pieces of rolling stock, and approximately 6,000-7,000 family members to Fort Lewis is simply not realistic. Forcing spouses to quit their jobs and pulling children out of

the schools in which they are currently enrolled and breaking friendships on short notice here in Hawaii would have catastrophic effects for this Stryker Brigade and the Army.

Simulated Training is No Substitute for Live Fire Training

18. Blank fire MILES training can increase the safety and accuracy of the Stryker crew members by allowing them to become even more proficient on their weapon system prior to the mandatory full caliber live fire qualification. Training with MILES can be helpful but still requires the use of a training area or facility to include some of the ranges on Schofield Barracks and PTA in order to be realistic. The 2/25th SBCT has created two additional gunnery tables using MILES to ensure that the crews are fully trained to the utmost extent prior to the firing of any live ammunition. This provides the SBCT with resource savings by firing less ammunition than would normally be required. The results of these actions contribute to mitigating the impact to cultural and environmental areas. There is, however, no substitute for live fire operations. Live fire operations at squad and platoon level must be completed prior to going to the National Training Center (NTC) and to combat in Iraq. If a unit has not done live fire operations, it is not allowed to go to NTC or to combat.

Accuracy of the Stryker

19. Precision gunnery operations that avoid cherished religious sites and do less collateral damage will win the hearts and minds of Iraqis during the execution of combat operations. The precision fires from our Stryker vehicles will also help protect the cultural sites and sensitive locations that are adjacent to important training areas at Schofield Barracks and PTA. The testing conducted on the Remote Weapons Station (RWS) revealed that the probability of hit (PH) for the .50 Caliber and MK-19 exceeded the Army's prerequisites for

accuracy. These results were computed by utilizing three Infantry Carrier Vehicles, which fired 2,404 rounds of .50 Caliber and 1,384 40mm grenades. This data determined the following: The targets that were used for the gunnery tests included a 4.6-meter horizontal by 2.3-meter vertical and a 2.3-meter horizontal by 2.3-meter vertical NATO standard panel at 500, 1,000 and 1,500 meters. The PH was determined to be at 100% for both .50 Caliber and MK-19 at 500 meters, 96-100% for both at 1,000 meters, and 76-97% for both at 1,500 meters. The lower percentages represent the smaller targets. This test was conducted twenty months ago at the Aberdeen Test Center. These test results show a significant increase in live fire weapons firing accuracy for both the .50 Caliber Heavy Machine Gun and the MK-19 Grenade Launcher when compared to the legacy ground mounted firing protocols that have been used in the past for these two weapons systems. Since this test, many modifications have been made to further enhance the capability of Stryker weapons systems. Some of these improvements include an auto focus mode to more clearly identify the target, enhanced ballistic tables in the onboard computer for greater accuracy, and improved control handle assemblies making it easier for the crew to engage and destroy the intended targets. All of these improvements have given the Stryker Brigades an unprecedented marksmanship capability that will ensure the destruction of the enemy while safeguarding important sites and structures in combat. These improvements also pay dividends during training in terms of protecting the cultural sites here in Hawaii. To that end, we can drive laterally along the Range 8 and QTR1 firing lines, instead of driving down the range roads, to accommodate Stryker crew qualification live fire gunnery requirements and prevent any of the harms that Plaintiffs allege may occur to endangered species.

The Training To Be Completed by the 2/25th SBCT is Not New to Schofield Barracks or PTA

20. The Stryker Brigade weapon systems provide the most technologically advanced firing capabilities known to man and will do less damage to the surrounding environment because of these improved capabilities. The weapons themselves – to include the basic design and caliber of the round fired – are not new; however, the firing platforms used in the Stryker Brigade to shoot these weapons have been improved to provide greater accuracy and will minimize collateral damage to sensitive sites, facilities, infrastructure, and civilians on the battlefield.

21. These staple weapons have been used at Schofield Barracks and PTA for the last 60 years. There is not any novelty in what we are doing or intend to do with the Stryker Brigade in Hawaii. Everything that we have done or plan to do in the future has been done before with great success at Schofield Barracks and PTA. This is evidenced by the continued existence of the sensitive cultural sites and endangered species found at both Schofield Barracks and PTA.

22. The history of the U.S. Army in Hawaii is best represented by the Soldiers that have trained here. Throughout its history a multitude of weapons, vehicles, and ammunition have been fired and used on its ranges. These weapons have ranged from 155mm artillery pieces, to 105mm main guns on tanks, to .50 Caliber Heavy Machine Guns, to the M129 40mm grenade launcher (fired from the M28 turret on the AH-1 G/MOD “Cobra” and UH-1M “Huey” helicopters), to .22 caliber rifles. Training on this installation has been fundamental to the success of the Division in all major wars to date. The current weaponry on Schofield Barracks is not new, but has been improved, and is some of the most technically advanced equipment that is

available in the world. The Stryker variants with the Remote Weapons Station (RWS) allow for crews to be fully protected while providing unprecedented stabilized, lethal, and accurate direct fires. Other Stryker variants which fire the M2 .50 Caliber or MK-19 40mm weapons have a power-assisted cupola that aids the gunner in providing accurate direct fires as well. The Stryker family of vehicles is a marked improvement over legacy and non-stabilized weapons in its improved survivability and its probability of successful target engagement. In comparison to the historical norms for ammunition usage in an infantry brigade, the stabilized weapons platforms of the Stryker Vehicles should require less ammunition to be expended to complete all necessary Stryker Brigade training tasks (e.g. qualification of weapons systems, gunnery, and scenario based live-fire engagements). The potential decreased ammunition usage will directly result in a decrease in the overall environmental impacts on ranges and the potential to disturb historical locations or structures.

23. Tank-equipped armored units have been stationed at Schofield Barracks throughout its storied sixty-year history. Some of the units stationed here have ranged from heavy armored battalions such as 3rd Battalion, 69th Tank Regiment to the 3rd Squadron, 4th U.S. Cavalry. A prime example of the type of training previously conducted here is the annual M60A1 Tank gunnery density conducted by Apache Troop, 3/4 CAV at Schofield Barracks and PTA. This unit utilized the impact area on Schofield Barracks to conduct preliminary gunnery training and then qualified on several ranges at PTA in the 1970s to the 1980s. Once qualified at PTA, the unit returned to Schofield Barracks to conduct maneuver training in the Kahuku training area. Apache Troop conducted this training with the full approval of Range Control both on Schofield and PTA. Many different training events occurred throughout history at PTA

utilizing indirect fire weapons as well as direct fire missiles to enhance the defense of the region.

The weapons were effective during their period in history but pale in comparison to the digitally enhanced and stabilized weapons used by Soldiers of the Stryker Brigade. Upon arrival of the M60A1 main battle tank, a full-tracked vehicle weighing approximately fifty-six tons (as opposed to the nineteen-ton wheeled Stryker Family of vehicles), units were required to develop training plans for both tactical and live fire operations to support unit missions. Live fire ranges were developed on Schofield Barracks, which enabled units to fire all weapons systems on-board the tank. The primary live fire range was a moving course located on the west side of Area X on Schofield Barracks just at the edge of the frontal range area. The targetry consisted of steel garbage dumpsters which were airlifted into the impact area. Live fire ranges on the Big Island were set within PTA. Targetry was set up on target lifters and also included a moving target system on a rail, which is what we intend to do as well. Again, we are not doing anything new with the MGS that has not already been done here at Schofield Barracks and PTA by much heavier armored vehicles.

24. Further, the recent litigation ruling and training allowances for weapons firing of ground-mounted M2 .50 Caliber Heavy Machine Guns and MK-19 40mm Grenade Launchers are exponentially more hazardous to the environment than the state-of-the-art full-solution stabilized firing systems that are inherent in the Remote Weapons Station (RWS) that is found on most Stryker Vehicles. The approval to fire the M2 .50 Caliber and MK-19 when positioned on the ground, but not when mounted on a Stryker is illogical, given the greater risk to the very cultural sites that the Plaintiffs desire to protect from ground positioned firing. The Army has offered a much more environmentally-compliant option in the Stryker Brigade, which provides

unprecedented accuracy and stabilization on all of its weapons systems, which in turn greatly reduces the risk to the sensitive sites at Schofield Barracks and PTA that all of us want to safeguard.

25. The Infantry Carrier Vehicle, Command Vehicle, Engineer Squad Vehicle, and Nuclear, Biological, and Chemical Vehicle all contain the Remote Weapons Station (RWS) which is capable of providing direct fires with unmatched accuracy. The RWS, when upgraded, contains all of the technology and equipment necessary to provide fully stabilized and pinpoint firing accuracy, which will assist in safeguarding cultural and other sensitive site locations at Schofield Barracks and PTA. Precision firing is accomplished by what is known as Vector Stabilization. The RWS has gyroscopic sensors to detect the rate, amount, and direction of movement, and applies an offset to the RWS ensuring a high probability of successful target engagement. This system also uses a Thermal Imaging Module to detect targets at night, whereas the M60A1 Tanks that trained at Schofield Barracks and PTA in the 1980s had to use a less effective passive infrared light for nighttime detection. Again, these improvements help safeguard sensitive site locations at Schofield Barracks and at PTA and are significant increases in our combat capability.

26. Not only are Stryker Vehicles more environmentally compliant by reduced impact on the ground (i.e. tracked vehicles historically were used here versus wheeled Stryker Vehicles now), but the Soldiers and civilians practice more disciplined stewardship by monitoring sensitive locations and planning for their protection from maneuver and weapons effects. Each company-size unit has a school-trained Environmental Compliance Officer who supervises weekly and quarterly training requirements specific to environmental laws and procedures.

Additionally, our Soldiers today are more highly trained with better optics on both personal weapons and vehicular weapons resulting in higher accuracy than before, which further results in less collateral damage to the environment.

27. The weapons used by the 2/25th SBCT at Schofield Barracks are not new; most date back over sixty years. What is new are the technological improvements that have been made to the weapons firing systems inherent in the Stryker Brigade in Hawaii.

28. The Stryker is a wheeled vehicle and is very similar in footprint to the large civilian construction trucks that are used extensively in Hawaii on a daily basis. The design of the Stryker is the same as the old Army quarter-ton Jeep that was used in the Korean War and the Vietnam War, which limits where a Stryker vehicle can travel. To be clear, we will only drive our Stryker Vehicles where they are authorized to travel; we will be in full compliance in the future as we have been in the past.

29. Finally, the Army has offered a much more environmentally compliant option in the Stryker Brigade, which provides unprecedented accuracy in all of its weapons systems, which in turn greatly reduces the risk to the sensitive sites at Schofield Barracks and PTA that all of us want to safeguard. The Army has gone to great lengths to be a good steward of the environment vis-à-vis the tanks and other armored vehicles that have been used in Hawaii in the past, as evidenced by the Stryker Vehicle enhancements noted above.

Why MGS is Necessary and Why We Need Range 11T

30. According to Army G-8 (Transformation) as of December 15, 2006, the collective consensus of the MGS project management office is that MGS will remain in theater until each unit is fielded with their respective systems. Thus, no Stryker units will be active in theater

without the support of MGS variants. This recent judgment accentuates the need to complete Range 11T at PTA to facilitate 2/25 SBCT MGS fielding in 2007 in preparation for future combat operations in Iraq.

31. Powerful weapons matter in combat, particularly in urban combat. The Mobile Gun System (MGS) optimizes our ability to close with and kill the enemy in urban combat while reducing collateral damage and further protecting civilians who are on the battlefield. The Stryker Brigade has a dual requirement to fight in an urban environment and also to be able to kill tanks and other armored formations on the battlefield. The nine anti-tank weapons systems we have in the brigade now and the twenty-seven Mobile Gun Systems we are projected to receive give us the capability we need to fight and survive on all battlefields. If we do not get the Mobile Gun System, our Soldiers will be at greater risk. The Army has a fielding plan to bring the Mobile Gun System to 2/25th SBCT, and we need this capability to be successful in all types of combat. The other Stryker Brigades did not have a choice to deploy with MGS because the testing of the system was not completed and the industrial base could not produce them fast enough to meet deployment timelines. The 2/25th SBCT does have a choice and to not field the MGS to this brigade would prevent the 2/25th SBCT from deploying with the strongest and best equipment available. We need to equip our Soldiers with the best equipment possible.

32. The following is an excerpt from the Capstone report on the Stryker family of vehicles published by the Developmental Test Command: *"Mobile Gun System (MGS). The MGS offers accurate and lethal direct fires to support the BCT force. It can be employed in support of assaulting infantry or as a maneuver force. The MGS is a key weapons overmatch platform to ensure mission success and survivability of the Combined Arms Company."* After Action

Reviews (AARs) from units that deployed to combat with Strykers have stated their strong desires to have had the MGS available to them as a combat multiplier in theater. The 4th Brigade, 2nd Infantry Division has recently completed its MGS OPNET and has stated its approval and tactical need to utilize the MGS Stryker variant. The MGS provides direct fires to assaulting infantry in such a manner that a larger armored vehicle cannot. The 120mm main gun on an M1 Abrams and its ammunition create a potential hazard to both nearby Soldiers and non-combatants. The MGS has a smaller main weapon (105mm) with ammunition that is designed to achieve intended target destruction with a smaller chance for collateral damage. The MGS also gives the combat commander a large caliber weapon platform that is easier to maintain. The need for a large caliber supplement to the SBCT has been met with the MGS. The only thing left is the fielding, training, and live fire training for our crews.

33. Range 11T at PTA was a tank range when armor units were stationed in Hawaii. Armored units simply deployed to the Big Island and unloaded at the docks and then proceeded to drive the tanks up to PTA. Once at PTA, the Soldiers performed maintenance and prepared their vehicles for tank gunnery on range 11T.

34. Last year a group of individuals, to include Range Division Hawaii and the Armor Center from Fort Knox, came to make an assessment of the training facilities at PTA. They toured the training areas and all parties agreed that 11T best supported the basic needs to complete MGS gunnery. They based this decision on the previous use of Range 11T as a tank range, minimal need for major construction, and the SDZ footprint. Once the area was selected, range planners at PTA drafted a plan for targets and firing points. They utilized existing roads in order to negate the need for more road construction and used some of the exact same target

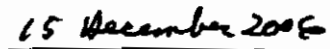
locations that the previous tank range had used. Once the plan was complete, it was submitted to the environmental office at PTA to ensure compliance with existing cultural and environmental locations. The environmental office recommended a few changes to the plan to make sure that none of the protected areas would be affected in any way. Range planners then enacted the changes, resubmitted the plan, and it was approved.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Stefan J. Banach", is written over a horizontal line.

Stefan J. Banach

Colonel, U.S. Army

A handwritten date "15 December 2006" is written in black ink over a horizontal line.

Date